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Attorneys for Plaintiff and Counter-Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

PSC CUSTOM, LLC, d/b/a POLAR
SERVICE CENTER,

Plaintiff,

-vs-

HANOVER AMERICAN INSURANCE
COMPANY, SECTOR CORPORATION,
and ST. JOHNS CORPORATION,

Defendants.

HANOVER AMERICAN INSURANCE
COMPANY,

Counterclaimant,

-vs-

PSC CUSTOM, LLC, d/b/a POLAR
SERVICE CENTER,

Counter-Defendant.

Case No. CV 20-132-BLG-SPW

**PSC CUSTOM, LLC, D/B/A
POLAR SERVICE CENTER'S
ANSWER TO HANOVER
AMERICAN INSURANCE
COMPANY'S
COUNTERCLAIM**

COMES NOW, Counter-Defendant PSC Custom, LLC, d/b/a Polar Service Center (“PSC”), by and through its attorneys, and answers Hanover American Insurance Company’s (“Hanover”) Counterclaim as follows:

1. Denied.
2. Admit.

AFFIRMATIVE DEFENSES

3. Hanover has waived or is estopped from denying coverage under the Policy, in whole or in part, as a result of its own actions or the actions of its representatives.

4. Hanover is not entitled to recovery of attorneys’ fees under the facts of this case and applicable law.

5. PSC reserves the right to amend or add affirmative defenses as this case and discovery progress.

WHEREFORE, PSC prays that Hanover take nothing by way of its Counterclaim, and that judgment be entered in favor of PSC, together with costs of suit and such other and further relief as the Court may deem just.

DATED this 23rd day of September, 2020.

MOULTON BELLINGHAM PC

By /s/ Adam Warren

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